

**FILED** *JR*

IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF SOUTH CAROLINA  
 FLORENCE DIVISION

DEC 30 2004

LARRY W. PROPPS, CLERK  
CHARLESTON, SC

Zachary Strickland, Jerry I. Strickland  
 and Marsha Strickland

Plaintiffs

v.

Ford Motor Company and Fair Bluff  
 Motors, Inc.

Defendants

Civil Action No.: 4:00-1391-28 *27*

FORD MOTOR COMPANY'S MOTION IN  
 LIMINE TO EXCLUDE PROFESSOR JOHN FREEMAN

Ford Motor Company ("Ford"), by counsel, moves in limine to exclude plaintiffs' designated expert witness, Professor John Freeman, from testifying at the trial of this action on the grounds that Professor Freeman is not qualified to render the opinions for which he is designated; Professor Freeman lacks a proper foundation for his opinions; Professor Freeman's proposed testimony is not properly the subject of expert testimony; and Professor Freeman's testimony is not relevant and is otherwise inadmissible; all as set forth in detail in Ford's Memorandum In Support Of Motion To Exclude Professor John Freeman, filed with this motion.

December 31, 2004

FORD MOTOR COMPANY

By Counsel

*Fed ID #4657*

John S. Wilkerson, III  
 J. Rene Josey  
 TURNER, PADGET, GRAHAM & LANEY, P.A.  
 Post Office Box 22129  
 Charleston, South 29413

Rosewell Page, III  
J. Tracy Walker, IV  
McGUIREWOODS, LLP  
One James Center  
901 East Cary Street  
Richmond, Virginia  
(804) 775-1000  
Counsel for the Defendants

**CERTIFICATE OF SERVICE**

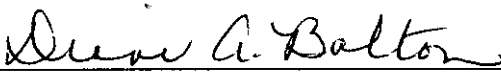
I hereby certify that a true and accurate copy of the foregoing Motion was mailed,  
postage prepaid to the following counsel of record:

J. Edward Bell, III  
J. EDWARD BELL, III, LL.C.  
232 King Street  
Post Office Box 2590  
Georgetown, South Carolina 29442

and hand-delivered to the following counsel of record:

Joseph F. Rice  
Rhett D. Klok  
Frederick J. Jekel  
Kevin R. Dean  
MOTLEY & RICE, LLC  
28 Bridgeside Boulevard  
Post Office Box 1792  
Mount Pleasant, South Carolina

this 3<sup>rd</sup> day of January, 2005.

  
Diane A. Bolton